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*Attorney for Creditor, The Commonwealth of the
Northern Mariana Islands*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS
BANKRUPTCY DIVISION**

In re

**IMPERIAL PACIFIC INTERNATIONAL
(CNMI), LLC**

**Debtor and
Debtor-in-possession**

**CASE NO. 24-00002
(Chapter 11)**

**DECLARATION OF EDWARD
DELEON GUERRERO**

I, EDWARD C. DELEON GUERRERO, hereby declare under penalty of perjury, that:

1. I am over the age of eighteen (18) and not a party to this action.
2. I am the Chairman of the Commonwealth Casino Commission. I have served in this role since May 2020.
3. The Commonwealth Casino Commission is a creditor in this action.
4. Debtor holds an exclusive license to operate a casino in the Commonwealth.
5. The Executive Director had filed five complaints seeking revocation of Debtor's casino license for the failure of Debtor to pay significant fees to the Commission and the Commonwealth and for its failure to comply with Commission Orders. From time to time, when the Executive Director's employment contracts with the Commission have expired, I have

1 stepped in to handle matters that had been delegated to the Executive Director. This includes
2 pursuing revocation of Debtor's casino license. Until proceedings were stayed by the filing of
3 this case, I was actively pursuing two complaints seeking revocation. The Commission was
4 scheduled to meet to decide the two complaints days after Debtor filed its bankruptcy petition.

5 6. Settlement discussions took place between Debtor and the Executive Director as early
6 as April 2022. Those discussions have continued between Debtor and the Executive Director and
7 myself for more than two years with no settlement being reached.

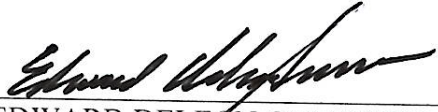
8 7. Debtor regularly reports to the Commission at its monthly meetings. At the meeting
9 held on May 30, 2024, Debtor's representative Howyo Chi reported to the Commission Debtor's
10 estimate that approximately \$150 million will be required to complete construction of its hotel
11 and casino building.

12 8. During the May 30, 2024 Commission meeting, Mr. Howyo Chi also stated to the
13 Commission that the U.S. Department of Labor barred it from hiring certain foreign workers for
14 a four to five year period.

15 9. Numerous additional violations by Debtor exist that have not yet been the subject of
16 complaints filed by the Commission (for example, its failure to appoint a Chief Executive
17 Officer). The Commission intends to ask this Court for relief from the automatic stay so it can
18 pursue enforcement of other regulatory violations not addressed by the pending actions.

19 10. Even if Debtor's suspension were lifted, numerous administrative requirements would
20 need to be met in order for Debtor to resume gaming operations; Debtor would need to, among
21 other requirements, present to the Commission a report from Gaming Laboratories International
22 auditing and certifying the proper working of the casino gaming machines; a staffing plan; a
23 complete and comprehensive "go-live" plan for casino operations and surveillance coverages for
24 thorough monitoring and compliance with the Minimum Internal Control Standards; a certificate
25 of occupancy for the physical casino facility; and copies of all U.S. and Commonwealth permits,
26 approvals and licenses required for operation; a casino closure plan/standard operating
27 procedure.
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1 I declare under penalty of perjury that the foregoing is true and correct. This Declaration
2 was executed on the 12th day of June, 2024, in Capitol Hill, Saipan, Commonwealth of the
3 Northern Mariana Islands.

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7 EDWARD DELEON GUERRERO
8 Chairman
9 Commonwealth Casino Commission
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